

EXHIBIT C

**Excerpt of Google Employee Deposition
Submitted Under Seal**

In the Matter Of:

In Re: Google Antitrust Litigation

August 10, 2021



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1 Q. (By Mr. Geiger) When did Google start working
2 on the [REDACTED]?

3 A. Sometime in the first half of 2020. I think it
4 was around springtime.

5 Q. Does this product have a code name?

6 A. Yes.

7 Q. Is that code name Banksy?

8 A. Yes.

9 Q. Have you worked on Banksy?

10 A. Yes. Well, I'm a manager; and someone on my
11 team is the product manager for Banksy.

12 Q. What work have you done on Banksy?

13 A. I was involved in proposing the original idea
14 that we designed in early 2020. I hired a product
15 manager to lead the effort, and I worked with
16 engineering managers to get it staffed.

17 Q. Did you create the original Banksy design?

18 A. I created a document proposing what it would
19 look like as a separate document called the Banksy
20 design document, which was authored by an engineer on
21 the team, not by me.

22 Q. Which engineer was that?

23 A. [REDACTED].

24 Q. Did you work on the technical design of Banksy?

25 A. [REDACTED] led the technical -- I designed the

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1 product proposal and vision, but the core technical
2 design was written by [REDACTED] with input from several
3 folks.

4 Q. And when [REDACTED] made the core
5 technical design, was he working off of the original
6 design that you had put together?

7 A. I'm not sure. I think that -- as I mentioned
8 earlier, part of our work process involves proposing an
9 idea and getting feedback and iterating on it and
10 refining it.

11 So I wouldn't be surprised if some of his
12 design might have come from earlier versions of a
13 proposal. My proposal was certainly informed by earlier
14 versions of this and other proposals.

15 Q. When you say your version was informed by
16 earlier versions, are you referring to [REDACTED]
17 [REDACTED]?

18 A. Yes. That's one of the things that informed
19 the Banksy proposal.

20 Q. Is Banksy intended to [REDACTED]
21 [REDACTED]?

22 A. [REDACTED]

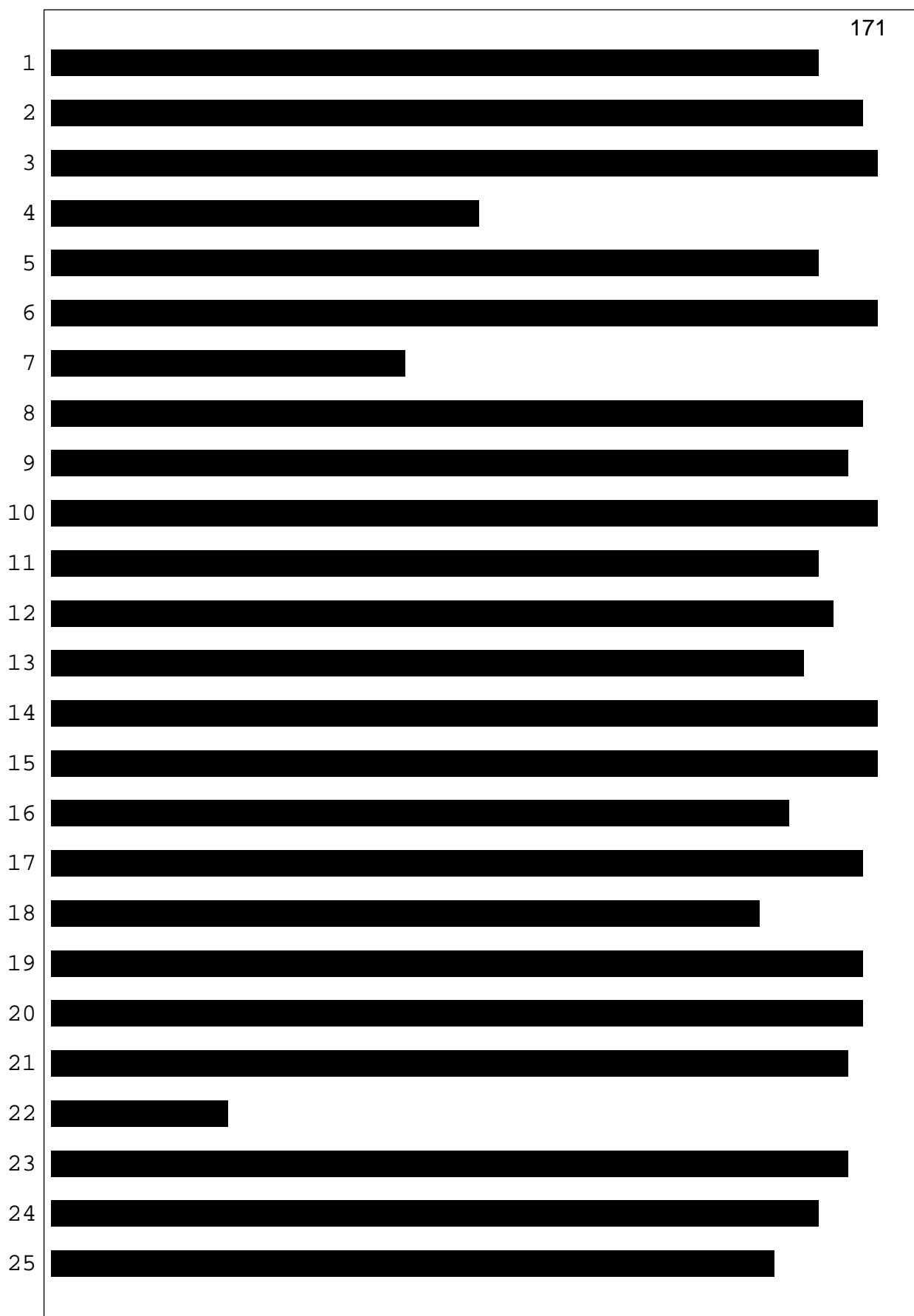
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

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1 [REDACTED] 170
2 [REDACTED]
3 [REDACTED]
4 Q. Well, what is the purpose of [REDACTED]?
5 A. The purpose of [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 A. Yes.
11 Q. [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 Q. How does Banksy actually work in practice?
24 A. [REDACTED]
25 [REDACTED]

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